

EXHIBIT C



Joshua Mello <kskustomsrideons@gmail.com>

Re: Mello vs Arruda Case Nos.: 1:2023-cv-00479 & 1:2023-cv-00480

1 message

Julia Benevides <Julia@desistolaw.com>
To: Joshua Mello <kskustomsrideons@gmail.com>
Cc: Marc DeSisto <marc@desistolaw.com>

Sun, Dec 15, 2024 at 12:11 PM

Good Morning Rachel,

My office did not scan the documents provided in the Defendants' Third Supplemental Response to Plaintiffs' Request for Production of Documents. I note that Plaintiffs' Request for Production of Documents did not request originals, and by providing a copy of the document, the Defendants responded in accordance with the Federal Rules of Civil Procedure.

Plaintiffs' Request for Production of Documents, Request No. 1 asked Defendants to "[p]rovide all documents in your answer to Interrogatory No. 4." The BCI document was provided as a supplemental response to that request."

Rule 37 provides that,

"A party seeking discovery may move for an order compelling an answer, designation, production, or inspection. This motion may be made if: (i) a deponent fails to answer a question asked under Rule 30 or 31; (ii) a corporation or other entity fails to make a designation under Rule 30(b)(6) or 31(a)(4); (iii) a party fails to answer an interrogatory submitted under Rule 33; or (iv) a party fails to produce documents or fails to respond that inspection will be permitted—or fails to permit inspection—as requested under Rule 34."

Rule 34(E) provides,

"Unless otherwise stipulated or ordered by the court, these procedures apply to producing documents or electronically stored information:(i) A party must produce documents as they are kept in the usual course of business or must organize and label them to correspond to the categories in the request; (ii) If a request does not specify a form for producing electronically stored information, a party must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms; and (iii) A party need not produce the same electronically stored information in more than one form."

Since the BCI document is related to Plaintiffs' arrest, it is responsive to Request No. 1. As such, Defendants complied with the rule in its response and supplemental responses. As for your request to view the original, the Cranston Police Department Captain who has been assisting me with the response documents is out of work until after the holidays. I can get back to you as to your inquiry after then. I

don't find that your remaining questions a request for more responsive answers under what was requested in Request No. 1, so I am unclear as to what the remaining questions in your Good Faith Letter are asking for.

Best,
Julia

Julia K. Scott-Benevides, Esq.

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From: Joshua Mello <kskustomsrideons@gmail.com>
Sent: Saturday, December 14, 2024 2:30:26 PM
To: Julia Benevides <Julia@desistolaw.com>
Cc: Marc DeSisto <marc@desistolaw.com>
Subject: Re: Mello vs Arruda Case Nos.: 1:2023-cv-00479 & 1:2023-cv-00480

Good Afternoon Julia,

There are several additional questions that you did not address including that we would like to see the original. There are inconsistencies in the document in which I stated in the "Good Faith Letter" that bring into question if it has been altered, edited or doctored that you just blatantly ignored. The metadata shows it was created and produced on a Konica Minolta bizhub C458 on November 18, 2024. Does your law office have that kind of copier/printer/scanner in which you created the PDF? Then you have the paper originals from the Cranston Police Department that you scanned at your law office in which we would like to see?

Additionally this is what some of the metadata reads and or indicates in the list below.

Understanding the Date/Time Entries:

1. Metadata Creation Date (11/18/2024):

- This reflects the original creation date of the document when it was first scanned or generated by the KONICA MINOLTA bizhub C458 device.